

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-2(c)

Loren L. Speziale, Esquire  
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Attorney for Creditor,  
Santander Bank, N.A.

IN RE:  
**BRIEANNE PEARSON**  
DEBTOR

**Chapter: 13**

**Case No.: 24-17821-JNP**

**Judge: Hon. Jerrold N. Poslusny, Jr., U.S.B.J.**

**Hearing Date: December 10, 2024 at 11:00 a.m.**

**Response Deadline: December 3, 2024**

**AMENDED NOTICE OF MOTION TO VACATE AUTOMATIC STAY**

**TO:**

Lee Martin Perlman, Esq.,  
1926 Greentree Road, Suite 100  
Cherry Hill, NJ 08003

Andrew B. Finberg  
Chapter 13 Standing Trustee  
535 Route 38, Suite 580  
Cherry Hill, NJ 08002

Brieanne Pearson  
62 Eraser Road  
Moorestown, NJ 08057

**SIR/MADAM:**

**PLEASE TAKE NOTICE** that on December 10, 2024 at 11:00 a.m., or as soon as counsel may be heard, the undersigned, attorneys for Santander Bank, N.A., the Secured Creditor, will move before the United States Bankruptcy Court, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, NJ 08101 for an Order Vacating the Automatic Stay, with respect to the Debtor's property located at 144 E. Bennett Avenue, Unit 4, Wildwood, NJ 08260

(“Premises”), and allowing Santander Bank, N.A., the Secured Creditor, to proceed with the filing of a mortgage foreclosure action against the Premises by reason of the Debtor’s failure to make the regular monthly payments. Any responses to the within Motion are due to be filed with the Court no later than **December 3, 2024**.

TAKE FURTHER NOTICE that the facts Santander Bank, N.A. relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court’s consideration of the within Motion, and

TAKE FURTHER NOTICE that oral argument is hereby NOT requested.

GROSS MCGINLEY, LLP  
Attorneys for Secured Creditor  
Santander Bank, N.A.

/s/Loren L. Speziale  
Loren L. Speziale, Esq.

DATED: November 20, 2024

**THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**